

DECLARATION OF VICTORIA C. PETTY

I, Victoria C. Petty, hereby declare:

1. I am an attorney at the Lawyers' Committee for Civil Rights of the San Francisco Bay Area ("LCCRSF"). I am licensed to practice law in the State of California.
2. I represent Y.G.H. in a habeas petition before the Eastern District of California. *Y.G.H. v. Trump, et al*, No. 1:25-cv-00435 (E.D. Cal.).
3. Y.G.H. is a 22-year-old Venezuelan national who entered the United States at a port of entry and was released on parole on or about September 13, 2023. He was also placed into removal proceedings. In February 2025, despite his continued parole, U.S. Immigration and Customs Enforcement ("ICE") arrested and detained Y.G.H.
4. On March 25, about 40 days after taking Y.G.H. into ICE custody, ICE published a post on Facebook calling Y.G.H. a "TdA ARREST," referring to the Tren de Aragua Gang. Y.G.H. is not a member of Tren de Aragua ("TdA"), nor has ICE ever presented him with evidence of that allegation or provided an opportunity for him to contest it.
5. When LCCRSF began representing Y.G.H., he was detained by ICE at Golden State Annex in McFarland, California. At some point on April 14, ICE abruptly removed Y.G.H. from Golden State Annex to an unknown location. We were unable to obtain any information from ICE, despite trying each of several ICE phone numbers during normal business hours, and we could not get in touch with Y.G.H. We were concerned that he would be subject to summary removal under the Alien Enemies Act, so LCCRSF immediately drafted and filed a habeas petition and later that night filed an emergency motion for a temporary restraining order ("TRO") in the Eastern District of California.
6. On April 15, a judge in the Eastern District of California issued a TRO enjoining the government from removing Y.G.H. from the United States. Late that evening, the government stated that Y.G.H. was at the Bluebonnet Detention Facility ("Bluebonnet") in Anson, Texas. Y.G.H. still has a master calendar hearing scheduled for May 8, 2025 before the Adelanto Immigration Court in California.
7. On April 16 and April 17, 2025, Y.G.H. shared the following over three phone calls.
8. Y.G.H. explained that when he arrived at Bluebonnet, he was placed in a dormitory with about 30 other men, all from Venezuela, and all, from Y.G.H.'s observations, bearing tattoos of different styles and images. Y.G.H. also heard from multiple other men in his dorm that they were accused of being TdA members, and that they learned of these accusations second-hand from friends and family members seeing ICE's posts on social media and/or on other news outlets. Like Y.G.H., the other detained men arrived at Bluebonnet recently from facilities outside of Texas, including in California, Arizona, and Colorado, and were still in removal proceedings.

9. Late Thursday evening, officers showed up at Y.G.H.'s dorm and took about five men away. The officers said the men did not have a choice whether to sign something or not, and that they were being deported. The men asked where to, but the officers refused to say.
10. Based on the events of the past few days, Y.G.H. fears that he will be summarily removed from the United States under the Alien Enemies Act.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Signed this 18th day of April, 2025 in Montrose, California.

A handwritten signature in black ink, appearing to read 'Victoria Petty', is written over a horizontal line.

Victoria Petty